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8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 JASON BROTHERTON,

15 Defendant.

Case No. 2:16-mj-620-PAL

**STIPULATION TO CONTINUE
PRELIMINARY HEARING**
(First Request)

16
17 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden,
18 United States Attorney, and Elham Roohani, Assistant United States Attorney, counsel for the
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Raquel Lazo,
20 Assistant Federal Public Defender, counsel for Jason Brotherton, that the Preliminary Hearing
21 currently scheduled on September 22, 2016 at 4:00 p.m., be vacated and continued to a date and
22 time convenient to the Court, but no sooner than sixty (60) days.

23 This Stipulation is entered into for the following reasons:

24 1. The parties are currently in the process of attempting to negotiate a pre-
25 indictment resolution. The additional time is needed to confer with her client and review
26 discovery.

2. Defendant is not incarcerated and does not object to a continuance.

4. Additionally, denial of this request for continuance could result in a miscarriage of justice.

This is the first request for continuance filed herein.

DATED this 15th day of September, 2016.

RENE L. VALLADARES
Federal Public Defender

DANIEL G. BOGDEN
United States Attorney

/s/ Raquel Lazo
By _____

RAQUEL LAZO
Assistant Federal Public Defender

/s/ Elham Roohani
By _____

ELHAM ROOHANI
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 JASON BROTHERTON,

7 Defendant.

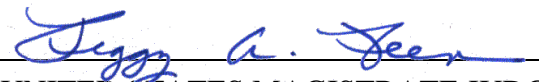
Case No. 2:16-mj-620-PAL

ORDER

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10 Based on the Stipulation of counsel and good cause appearing,

11 IT IS THEREFORE ORDERED that the Preliminary Hearing currently scheduled on
12 September 22, 2016 at the hour of 4:00 p.m., be vacated and continued to November 22,
13 2016, at the hour of 4:00 p.m.

14 DATED this 19th of September, 2016.

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16 
17 UNITED STATES MAGISTRATE JUDGE